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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

SPCC Plan

ASH GROVE CEMENT COMPANY
3801 East Marginal Way South
Seattle, Washington

1993



AGC2H000569

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The Kiln system is fed the dry material through a series of cyclones that pre-heat the feed with exhaust gasses before it is introduced to the kiln. Inside the kiln the raw feed is heated to 2800 degrees F and the reaction of the individual components into calcium silicate nodules is completed. This material is called clinker. Natural gas and coal alternate as primary fuels depending on the time of year. One may be used to back up the other.

The 24 hour per day, 7 day per week operation has a process capacity of 750,000 tons per year. The attached drawings show the property boundaries, adjacent streets and waterways, and on site buildings. There is no storm water discharge from this facility into the bordering waterway. Storm water from the plant passes through an oil - water separator and an underground retention tank before being discharged into the METRO storm drain. Water from the truck wash area is diverted to the METRO sanitary sewer system under permit number 296.

STORAGE SITE LOCATION

All petroleum and non-petroleum products are stored in aboveground storage tanks (AST). No underground storage tanks are located at this facility.

	<u>No.</u>	<u>Capacity</u>	<u>Contents</u>	<u>Condition</u>
A.	1	1000 gallons	Diesel	Outdoor/Containment
B.	1	6000 gallons	Amine Acetate	Outdoor/Containment
C.	1	4400 gallons	7:1 Water and Amine Acetate	Indoor/ Containment
D.	1	4400 gallons	Water and Vinsol NVX	Indoor/ Containment
E.	1	350 gallons	Hydraulic oil	Outdoor/Reservoir pan; Dock Crane
F.	1	374 gallons	Hydraulic oil	Indoor/Raw Mill; No Containment
G.	1	600 gallon	Used oil	Outdoor/Containment
H.	1	300 gallons	Diesel	Portable Tank
TOTAL: 17,424 gallons				

3. PAST SPILL EXPERIENCE

This facility has been operated by Ash Grove Cement Company since 1984 without a significant product spill.

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B. 6000 gallons, Amine Acetate, Storage Tank
Outdoor/Containment

A single storage tank (AST) shown as location B is outdoors at the South West corner of the Finish Mill Building. The vertical tank is made of 1/4" stainless steel all welded construction with a 3" diameter fill and vent ports for storage of Amine Acetate Mixture; Trade Name: UCAR Cement Grinding Aid No. 4. A Material Safety Data Sheet (MSDS) is provided in the Appendix H. The tank is a 6000 gallon capacity vertical tank. The tank is equipped with a float level gauge. A pump for dispensing the Grinding Aid is located within the Finish Mill Building. Capture pans are provided at all potential drip sites

A concrete containment completely impounds the area. Volume of the containment is 7000 Gallons. A portable sump pump is used to remove rain water or spilled product. The contained liquid is tested by the plant's chief chemist or his designate to determine whether contamination is present. Clean water is pumped to the storm water system. If contaminated, the water is pumped to the Finish Mill grinding aid tank (identified in section C below).

Amine Acetate is received by truck delivery and offloaded into the tank by the delivery personnel. Procedures for ordering and receiving Grinding Aid require that an authorized Ash Grove representative is contacted and present during the off-loading process. Delivery personnel are required to attend the controls at all times during off-loading process. Each delivery truck is required to contain spill absorbant material for immediate response and cleanup of any spill occurring on site. Additional cleanup material is located in the immediate area of the Finish Mill and maintained ready for use.

Procedures for transfer operations and spill response (see Appendix C) are posted at the tank location for quick reference by plant personnel.

Routine inspection is accomplished daily during each shift by Shift Supervisors and Quality Assistants. The system is maintained in accordance with plant preventative maintenance programs which will include periodic inspections of the containment for cracks or other damage. Defects effecting the integrity of the containment will be remedied immediately.

E. 350 gallon Hydraulic Dock Crane:
Outdoor/Reservoir Pan.

The crane located on the receiving dock at location E is an electrically powered, hydraulically operated "A" Frame Breast Derrick.

The hydraulic reservoir is a 350 gallon capacity horizontal tank designed to contain Chevron AW ISO 32 Hydraulic Fluid. The tank is mounted above the power unit and spill pan. The pan is designed to contain any leaks in the tank and pump unit. The capacity for the containment pan is 175 gallons. A 10" fluid level sight gauge is provided to monitor any changes in fluid levels within the tank. The system is designed to automatically shut down whenever a loss of 1/2 the tank volume is detected by a side mounted liquid level switch.

Hydraulic lines for the operation of the winches are 2" SCHEDULE 80 Pipe. Hydraulic lines for winch control are 1/2" SCHEDULE 80 Pipe. Soft piping is used to connect with the hard lines at the control valves and the hoist winch on the dock and with the on shore boom winch.

Spill cleanup and containment material is located on the dock and on shore in the immediate area and maintained for use. Personnel that work on the dock will immediately clean and initiate repairs to the cause of any leak. In the event of a spill, action will be taken by area personnel to prevent any water contamination and begin initial cleanup before the arrival of contract response personnel.

Procedure for spill response (see Appendix D) is posted at the tank location for quick reference by plant personnel.

Routine inspection is accomplished prior to and after each operation by the crane operator. The system is maintained in accordance with plant preventative maintenance programs which will include periodic inspections of the containment for cracks or other damage. Defects effecting the integrity of the containment will be remedied immediately.

A portable electric pump is used to transfer the oil product from a portable transfer container, typically a 55 gallon drum to the tank. Prior to transfer, the receiving tank is inspected to insure sufficient volume remains available to receive the oil. During transfer, plant personnel must remain at the tank to monitor the operation. The fill opening is locked closed when not in use.

A concrete containment completely impounds the area. Volume of the containment is 1137 gallons. A manually activated sump pump is used to remove rain water into the holding tank for disposal with the oil. The pump is continually monitored to prevent overfilling during this operation. If present, floating product in the containment will be pumped along with the water prior into the tank.

The used oil consists of spent lubricants meeting the requirements specified in WAC 173-303-515 for Spec oil. All used oil is generated at the Seattle Plant. Used Oil is sampled for analysis then later drained from process machinery into the transfer container. Container sizes may vary depending on the amount of oil to be changed. The container must be in good condition and inspected prior to use for damage or deterioration which could be potential leak sites. Containers are filled and closed before moving. Any spillage which occurring while the container is being filled will be immediately cleaned up with oil absorbant material.

Larger containers are moved to the holding tank by fork lift truck by authorized plant personnel. Cleanup material is located adjacent to the holding tank. Additional clean up materials are stored and maintained for immediate use at the following locations:

1. Group II silos at base of office stairs.
2. Raw Mill Hydraulic Building.
3. Receiving Dock
4. Finish Mill, SW corner first floor.
5. Clinkler Annex.
6. Burner Building-NW corner ground floor
7. Used Oil Storage Tanks

Procedures for spill response (see Appendix F) are posted at the location of the tank for quick reference by plant personnel.

Routine inspection is accomplished daily during each shift by Shift Supervisors and lubrication personnel. The system is maintained in accordance with plant preventative maintenance programs which will include periodic inspections of the containment for cracks or other damage. Defects effecting the integrity of the containment will be remedied immediately.

B. Vehicular

Receiving stations for diesel fuel and Amine Acetate are located within containment areas. Personnel closely supervise all unloading, and any spill must be cleaned up immediately by attending personnel and reported to management. Cleanup and spill control material are located close to the receiving stations. Delivery personnel are required to stay with their vehicle while unloading.

5. SPILL REACTION

If a petroleum or product spill occurs, the Production Supervisor must be notified according to Plant Emergency Notification procedures (see appendix A) and will immediately act to eliminate the cause of the spill and contain the spread. In case of a spill into or one that threatens the waterway or the METRO sanitary sewer or storm drain, the appropriate agencies and FOSS Environmental will be immediately notified. On the attached property map, the location of building sumps and storm drains is shown. In the event of a spill the supervisor or other personnel can quickly locate any effected drain and construct a berm to prevent the spilled material from entering the drains.

6. PERSONNEL:

- A. A copy of this plan is included in the plant's Emergency Operating Plan and posted on employee bulletin boards. All personnel must be familiar with the location and content of the plan. The plan will be reviewed quarterly by all supervisors.
- B. Instructions for reporting spills and other emergencies (Appendix A) are posted on employee bulletin boards.
- C. A copy of 40 CFR part 112, and appropriate contacts and telephone listings for the Washington Department of Ecology are maintained by the Safety and Environmental Department.

Appendix A

PLANT EMERGENCY NOTIFICATION

REPORT ANY PLANT EMERGENCY TO THE CONTROL ROOM

Fire, Medical, Spills

1. By TELEPHONE: dial INT ext 211.
or
By RADIO: Request radio silence and call UNIT 1
(Control Room).
2. State your NAME, LOCATION, and NATURE of EMERGENCY.
3. Give assistance or start evacuation of the area.

RESPONSE

Control Room Operator

When notified of an on-site emergency, the Control Room Operator will:

1. Notify the Production Supervisor of the emergency.
 - A. If the plant radio is used, request radio silence
2. When advised by the Production Supervisor, request emergency assistance from the appropriate agency ("911" or spill response) and provide needed information:
 - A. Identify yourself (name and title)
 - B. The plant location:
Ash Grove Cement Company
3801 East Marginal Way South
Seattle, WA
Plant Telephone 623-5596
 - C. Identify the type of emergency
 - D. Instruct the responding agency that a guide will meet the emergency vehicles at the main entrance and escort.

Production Supervisor

The Production Supervisor will coordinate the company's initial response. Upon notification, the Production Supervisor will:

1. Restrict the use of radios to communications involving the emergency.
2. Dispatch a guide to meet and escort the arriving emergency vehicles to the emergency scene;
3. Confirm with the Control Room Operator that the appropriate emergency response agency has been notified
4. Take steps as appropriate to control the situation;
5. Assess the site for injured and administer first aid;
6. If necessary, instruct the Control Room Operator to begin an orderly and controlled shutdown of the plant and order a plant evacuation.
7. Account for all employees and visitors on site.
8. Restrict public access to the property and refer all inquiries from the public or the press without comment to the Plant Manager.
9. Notify and Plant management.

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AMINE ACETATE TRANSFERRING PROCEDURES

Upon delivery of Amine Acetate to be stored in the Grinding Aid tank, the company representative will meet and escort the delivery truck to the tank.

1. Prior to transferring Amine Acetate to the storage tank the following action must be taken by the company representative:
 - A. Inspect the tank for evidence of leaks or corrosion. and the spill containment area for spills for cracks.
 1. Notify the Control Room x211 (radio Unit 1) if a spill or leak is discovered, do not transfer delivery to tank.
 - B. Inspect the spill containment for cracks or other damage that could result in failure of the containment.
 1. Notify the Control Room (radio Unit 1) if any deformation is found. Do not transfer delivery to tank.
 - C. Insure that spill clean up material is on hand in the Finish Mill Building and on the delivery truck.
 - D. Inspect the delivery hose and hose connections to insure that is free of obvious defects and be familiar with the pump controls on the truck in order to stop product transfer in case of an emergency.
2. During transfer operations, the company representative and the delivery truck driver will be present.
3. In case of a spill:
 - A. Stop product transfer,
 - B. Notify the Control Room x211 (radio Unit 1)
 - C. Use spill cleanup material to contain product spill from spreading.

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RAW MILL HYDRAULIC OIL SPILL PROCEDURES

1. In case of a spill:
 - A. Notify the Control Room x211 (radio Unit 1)
 - B. Use spill cleanup material, soil or other readily available material to contain product spill from spreading.

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PORTABLE DIESEL TANK PROCEDURES
and site map

1. Prior to moving the tank the following action must be taken by the lift truck operator:
 - A. Inspect the tank for evidence of leaks or corrosion.
 - B. Inspect the delivery hose, pump and connections for defects. Report any found to your supervisor.
 - C. Insure that tank spill kit is on hand and is transported along with the tank.
2. This tank is not to be taken
 - A. Within 250 feet of the waterfront,
 - B. Near the storm drains at the north west corner of the Clinker Storage silos (See site map for drain locations),
 - C. Near the wash rack basin near the Group II silos.
3. In case of a spill:
 - A. Stop transfer,
 - B. Notify the Control Room x211 (radio Unit 1)
 - C. Use material in the spill kit to prevent spill from spreading.
 - D. If needed, additional spill kits are Located
 1. Group II silos at base of office stairs.
 2. Raw Mill Hydraulic Building.
 3. Receiving Dock
 4. Finish Mill, SW corner first floor.
 5. Clinkler Annex.
 6. Burner Building-NW corner ground floor
 7. Used Oil Storage Tanks